

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

GUILDWORKS, LLC and

GUILDWORKS-WORKS, LLC

Debtors.

Case No. 22-30388-thp11 (Lead Case)

Case No. 22-30389-thp11

STIPULATED MOTION TO APPROVE
SECURED CREDITOR FEES AND
COSTS

Secured creditor Seattle Economic Development Fund, dba Business Impact NW (“BINW”) and the Guildworks, LLC (the “Debtor”), hereby stipulate and move for entry of an order as follows:

1. On September 17, 2024, an Order Confirming Debtors’ Amended First Modified Joint Plan of Reorganization Dated August 8, 2024, Pursuant to 11 U.S.C. §§1191(b) and 1191(c) (the “Order”) was entered (Dkt. 205).

2. Pursuant to the Amended First Modified Joint Plan of Reorganization (the “Amended Plan”) (Dkt. 189), BINW, as holder of a secured claim (Class 1), is entitled to seek its attorney fees and costs pursuant to 11 U.S.C. §506(b). Such fees and costs may be agreed to between BINW and Debtor. Amended Plan at Section IV.

STIPULATED MOTION TO APPROVE SECURED CREDITOR
FEES AND COSTS - 1

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1 3. Debtor and BINW hereby stipulate to the allowance of \$4,671.50 in fees and
2 \$2.50 in costs to be added to the Class 1 claim and paid as part of the Plan as amended by the
3 Order.

4 WHEREFORE, BINW and Debtor requests the Court to enter an order approving this
5 stipulation and approving BINW's fees and costs pursuant to 11 U.S.C. §506(b).

6 DATED this 23rd day of September 2024.

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ELEVATE LAW GROUP

9 By /s/ Daniel J. Bugbee

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By /s/ Troy G. Sexton (per email authorization)

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CERTIFICATE OF SERVICE

I, Daniel J. Bugbee, hereby certify that on September 23, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which causes parties who are registered ECF participants to be served by electronic means.

DATED this 23rd day of September 2024, at Seattle, Washington.

By /s/ Daniel J. Bugbee
Daniel J. Bugbee, OSB #155244